

The Honorable John C. Coughenour

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

CONTINENTAL CASUALTY COMPANY  
Plaintiff,

V.

ROSALINDA HERRERA HEREDIA, individually and as parent and guardian of A.R.H., a minor; JUAN REYES TAPIA; LESLIE REYES-HERRERA; ANA HERRERA HEREDIA, individually and as parent and guardian of E.H., a minor; EDUARDO HERNANDEZ HERRERA; SAMPSON KWAKU GYAN and GEORGINA TWUMWAA GYAN, both individually and as parents and guardians of M.G., a minor; AMANDA POMAA GYAN; FRANCIS KWADWO GYAN; ANGELINA ADOMA GYAN; MEUY CHANG SAETURN and BUON DUANGPRASAERT, both individually and as parents and guardians of A.D., a minor; GIFTY EGHAN; JOYCE MENSAH, individually and as parent and guardian of E.D., a minor, and JUSTIN ALEXANDER (as assignees of VIP International Real Estate Group, Inc.); and VIP International Real Estate Group, Inc., a Washington corporation Defendants.

NO. 2:24-cv-00917-JCC

**STIPULATION AND {PROPOSED}  
ORDER FOR EXTENSION OF TIME  
FOR DEFENDANTS TO RESPOND  
TO FIRST AMENDED COMPLAINT**

## **NOTE ON MOTION CALENDAR: OCTOBER 2, 2024**

1 WHEREAS, pursuant to Fed. R. Civ. P. 6(b)(1)(A), Plaintiff and Defendants stipulate to  
2 extend the time for Defendants to answer or otherwise respond to Plaintiff's First Amended  
3 Complaint until November 1, 2024. Counsel for Plaintiff and Defendants have conferred  
4 regarding this request. Good cause exists for this request because there are numerous defendants  
5 who require more time to adequately investigate and respond.

6 By execution of this stipulation, Defendants do not waive any defenses. Each side  
7 preserves all of their respective rights and positions, and both sides agree that the execution of  
8 this stipulation shall not impact their respective rights and positions.

9 WHEREAS, Defendants have not requested previous extensions from this Court. A  
10 proposed order is submitted with this stipulation.

11 IT IS THEREFORE STIPULATED AND AGREED, by and between Plaintiff and  
12 Defendants, by and through their counsel and subject to approval of this Court.

13 DATED this 2<sup>nd</sup> day of October, 2024.

14 STRITMATTER KESSLER KOEHLER MOORE

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17 s/ Andrew Ackley

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24 Counsel for Defendants

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STIPULATION AND [PROPOSED] ORDER FOR  
EXTENSION OF TIME FOR DEFENDANTS TO  
RESPOND TO FIRST AMENDED COMPLAINT - 2

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11 Casualty Company

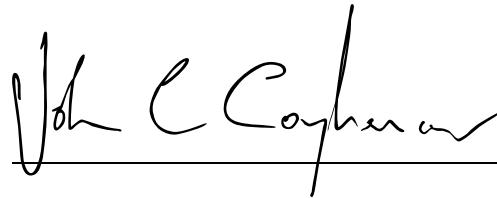
1                   **PROPOSED ORDER**

2       Based upon the foregoing Stipulation, and the Court being fully advised in the premises,

3       NOW, THEREFORE,

4       IT IS HEREBY ORDERED that the deadline for Defendants to file their Response  
5       Answer to Plaintiff's First Amended Complaint is extended by thirty (30) days and is now due  
6       on or before November 1, 2024.

7                   Dated this 3rd day of October, 2024.

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10                    
11  
12                  The Honorable John C. Coughenour  
13                  United States District Judge